

# **EXHIBIT C**

**VIDEOTAPED DEPOSITION OF JOHN GHRAYEB, Ph.D.  
CONDUCTED ON TUESDAY, JANUARY 11, 2011**

1

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MASSACHUSETTS

3 ABBOTT GMBH & CO., KG, :

4 ABBOTT BIORESEARCH CENTER, INC. :

5 AND ABBOTT BIOTECHNOLOGY LTD., :

6 Plaintiffs :

7 v. : Civil Action No.

8 CENTOCOR ORTHO BIOTECH, INC. : 4:09-CV-11340-FDS

9 AND CENTOCOR BIOLOGICS, LLC :

10 Defendants :

11 -----

12 Videotaped Deposition of JOHN GHRAYEB, Ph.D.

13 Philadelphia, Pennsylvania

14 Tuesday, January 11, 2011

15 9:35 a.m.

16 Job No.: 1-191718

17 Pages: 1 - 147

18 Reported By: Dawn M. Hart, Notary Public, RPR/RMR

19 Videographer: David Lane

20

21

22

Merrill LAD

(202)861-3410 (800)292-4789 (301)762-8282 (703)288-0026

VIDEOTAPED DEPOSITION OF JOHN GHRAYEB, Ph.D.  
CONDUCTED ON TUESDAY, JANUARY 11, 2011

137

1 BY MR. SHAH:

2 Q Do you recognize this as an e-mail from you  
3 to David Knight and others on January 2nd, 2003?

4 A Yes, in response to, you know, other  
5 e-mails.

6 Q Would you take a moment and just read  
7 through the two previous e-mails in the chain.

8 A (Complying.)

9 Okay.

10 Q First, what is AME?

11 A It's a company called Applied Molecular  
12 Evolution.

13 Q And what technology were they using?

14 A They had a way to turn a mouse antibody into  
15 an antibody that's more human using, you know, their  
16 own specific technique of changing the sequences.

17 Q Is this similar to what would be known as  
18 CDR grafting?

19 A Not, not the way they do it.

20 Q So does that technology leave you with any  
21 murine-derived sequences in the final product to your  
22 recollection?

VIDEOTAPED DEPOSITION OF JOHN GHRAYEB, Ph.D.  
CONDUCTED ON TUESDAY, JANUARY 11, 2011

138

1 MS. VERRECCHIO: Objection. Calls for  
2 expert testimony.

3 A I think, you know, without analyzing what  
4 the new antibody looks like, I can't tell you that.

5 Q If I understand the comment you make at the  
6 top of the e-mail chain, you note that in your  
7 experience, quote, if you own it, what you call it is  
8 what it is. Can you briefly explain that?

9 A It's probably a very flippant remark based  
10 on my biases. But, you know, I've seen people call  
11 antibodies fully human, including companies we both  
12 know, that, you know, stretches the definition of the  
13 purest -- you know, what is human? Human is something  
14 that comes from you and me. And I think that's kind  
15 of what my, my definition of human versus humanized.

16 Q And just at the -- just to finish the  
17 thought in the last phrase there, it says, so in the  
18 end we can call it fully human because we can use good  
19 logical arguments to support it.

20 Does that mean that logically some  
21 antibodies which are originally derived from murine  
22 origin would still logically be called fully human?